

Waterson, Sara

From: Waterson, Sara
Sent: Thursday, April 23, 2020 7:30 AM
To: Kathy Jones
Subject: RE: Tornado cleanup in Hamilton County, Tennessee

Out of curiosity- did you check out your data around when the burn may have happened? I wonder if it shows anything (although it hasn't been too warm yet, thank goodness). Would be interesting.

Similar to a regular exceptional event, please keep any news articles, etc for documentation.

Stay safe today, the weather is just rolling in down here. And yes, I guess we are supposed to start opening tomorrow. My family will be staying in our house for the foreseeable future. I just hope we don't get a quarantine restriction on us because we have a trip to FL planned to hopefully occur in July.

Have a good one-
Sara

From: Kathy Jones <mkjones@chattanooga.gov>
Sent: Wednesday, April 22, 2020 3:58 PM
To: Waterson, Sara <Waterson.Sara@epa.gov>
Subject: Re: Tornado cleanup in Hamilton County, Tennessee

I drove through one of the disaster areas Monday night and it is bad. There are huge piles of brush and lots of trees down. Our data is low these days but I will flag anything I think has been affected. I am particularly worried about June ozone since Bob extended the burning into June. We may get more tornadoes tomorrow. I was out near the Soddy site Saturday night and there was a big burn about a mile from the Soddy site.

I appreciate your response. I knew I had seen something in a document about disasters in the past but I did not go back and read the 2007 rule again. I concentrated on the 2016 rule.

I wanted to touch base with Region 4 in case we ran into a problem. We did not have one ozone exceedance last year, but this year could be different. The weather Gods smiled on us because I talked to some agencies that had quite a few last year.

Hope you and your family are well. Guess Georgia is opening back up (a little soon I think). Best regards, Kathy Jones

On Wed, Apr 22, 2020 at 3:16 PM Waterson, Sara <Waterson.Sara@epa.gov> wrote:

Kathy-

Darren did some follow-up on your question, so I owe all of this to him.

While we agree that typical open burning of debris definitely does not qualify as prescribed burning, the preamble to the 2007 Exceptional Events Rule- Natural Disasters and Associated Clean-up Activities (72 FR 13565) seems to address this. In short, clean-up activities associated with natural disasters like tornadoes for which state, local, or federal relief has been granted, may be considered exceptional events. The preamble goes on to say that EPA believes that for a

major natural disaster, a timeframe of 12 months is reasonable for clean-up activities. However, states may request a longer period of time for clean-up if the event was so substantial that 12 months is inadequate.

Although we did not specifically address clean-up activities in the 2016 Exceptional Events Rule, our position remains that air emissions resulting from burning debris in clean-up activities for natural disasters like tornadoes, and which resulted in a monitored exceedance and/or violation of a NAAQS, may be eligible for consideration for data exclusion under the Exceptional Events Rule. It would be an exceptional event determined on a case-by-case basis as human activity unlikely to recur at a particular location.

We encourage you to flag data you believe are impacted by these open burning activities and we'll work with you to determine the appropriate level of documentation that must be submitted should a regulatory violation of a NAAQS occur.

I hope that helps!

Sara

From: Kathy Jones <mkjones@chattanooga.gov>

Sent: Wednesday, April 15, 2020 3:11 PM

To: Waterson, Sara <Waterson.Sara@epa.gov>; Palmer, Darren <Palmer.Darren@epa.gov>

Subject: Tornado cleanup in Hamilton County, Tennessee

Our agency has just announced that we are going to allow open burning of tornado debris until June 15 with a special permit from Air Pollution (and a pre-inspection). One of the hard-hit areas is less than 5 miles (as the crow flies) from our ozone monitoring site at Eastside Utility. The Chattanooga.com says that 15,000 properties in Hamilton County are being assessed for damage (some in Soddy near our Soddy site). I wanted to give you the heads-up because it is possible that the burning will run up our ozone in May and June. We had no exceedances last ozone year in 2019 but this year could be different.

I have been reading the exceptional event rules and it does not seem that debris burning from a disaster is covered under "exceptional events" since the burning is "preventable and controllable" (language from 50.14). Is that also your interpretation of the rules? It covers fireworks, high winds, prescribed burns and wildfires, haboobs, and discusses a few other situations, but I did not find where it addresses disasters- unless I missed it somewhere. Can you consider an exceptional event request under disaster circumstances?

I wanted to touch base with you so that you know what we are doing. Normally our agency ends open burning April 30. Our 2.5 speciation data (ended about 2015) indicated the burn ban in Hamilton County May 1- September 30 was

beneficial to our pollution reduction.

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Kathy Jones

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